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February 17, 2023

VIA EMAIL & U.S. MAIL

attorney@jenniferdemaster.com

Attorney Jennifer DeMaster
361 Falls Rd # 610
Grafton, WI 53204

Re: False Allegations

Dear Attorney DeMaster:

As you are aware, our firm represents Alexandra Guevara and Jamie Haack. We previously sent correspondence to you and your client, Todd Wolf, on December 7, 2022, requesting that Mr. Wolf immediately cease and desist making defamatory statements against our clients. Despite our warnings, it appears that you have double-downed these false allegations in a recently filed federal lawsuit. **I write to advise you and Mr. Wolf to immediately cease and desist repeating these false statements against our clients.**

To be specific, I'm referring to the false allegations you have asserted in a publicly available filing in the Eastern District of Wisconsin, Case No. 23-cv-149, *Wolf v. City of Sheboygan, et. al.* Once again, you falsely claim that Ms. Guevara and Ms. Haack threatened Mr. Wolf "to get paid" and demanded \$70,000.00 for DEI work. Further, you generally assert that our clients were involved in a conspiracy to manufacture legal liability against Mr. Wolf.

Make no mistake: these allegations are false. Our clients retained counsel on their own because Mr. Wolf accused them of committing crimes such as bribing and extorting a public official – with no factual bases for these accusations.

For reasons outlined in our previous correspondence, our clients are entitled to pursue claims against you both for defamation and other legal relief. Indeed, you have asserted

new allegations in the complaint that have revealed additional instances of publication of your defamatory statements. We are continuing to investigate the full potential of your legal liability.

By repeating these allegations in a filing in federal court, you and Mr. Wolf may also be sanctioned by the district court. Under the Federal Rules of Civil Procedure, you certified that "to the best of [your] knowledge, information, and belief formed after reasonable inquiry," the allegations in the complaint are "well grounded in fact and [are] warranted by existing law." Fed. R. Civ. Pro. 11. Violating this Rule may result in the district court issuing sanctions against both the party and the attorney, which may include "reasonable expenses...including reasonable attorney's fee." *Id.*; *Ordover v. Feldman*, 826 F.2d 1569, 1573 (7th Cir. 1987).

Either you knew, or after reasonable inquiry, should have known, that the allegations you have made against our clients "are not well grounded in fact" or "warranted by existing law." Accordingly, the district court may be well justified in issuing sanctions to you both for repeating the false allegations against our clients.

Ultimately, we hope you will heed our warning to **immediately cease and desist** repeating these false allegations. As new allegations in your complaint make clear, we are only beginning to understand the total scope of your liability for your defamatory statements. Our clients have advised us to continue exploring any and all potential legal remedies available to them should you ignore this letter and continue repeating your untrue and defamatory statements.

We appreciate your immediate attention to this matter.

Sincerely,

PINES BACH LLP



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